

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth and ERS.

**ORDER GRANTING FOUR HUNDRED SEVENTY-SECOND
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO
RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR
WHICH THE DEBTORS ARE NOT LIABLE**

*Upon the Four Hundred Seventy-Second Omnibus Objection (Substantive) of the
Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the
Commonwealth of Puerto Rico to Claims for which the Debtors Are Not Liable [ECF No. 21421]*

¹ The Debtors in the Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

(the “Four Hundred Seventy-Second Omnibus Objection”)² of the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), dated July 1, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Seventy-Second Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Seventy-Second Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Seventy-Second Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Four Hundred Seventy-Second Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which neither the Commonwealth nor any other Title III debtor is liable; and the Court having determined that the relief sought in the Four Hundred Seventy-Second Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Seventy-Second Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Seventy-Second Omnibus Objection is GRANTED as set forth herein; and it is further

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Seventy-Second Omnibus Objection.

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 21421 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Seventy-Second Omnibus Objection

Four Hundred Seventy-Second Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	COLON SERRANO, GERARDO HC 40 BOX 43626 SAN LORENZO, PR 00754	06/29/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	149084-1	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Frente Unido de Policías Organizados et al. v. Puerto Rico Police Department, Case No. KAC-2007-4170 ("FUPO"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim No. 161091, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned "FUPO".						
2	CRESPO PEREZ, EFRAIN APARTADO 1050 ADJUNTAS, PR 00605	10/01/2019	17 BK 03283-LTS	Commonwealth of Puerto Rico	171253-1	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Department of Corrections & Rehabilitation, Case No. KAC-1996-1381 ("Maldonado Colón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim no. 152372, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned Maldonado Colon.						
3	DIAZ LOPEZ, BRIAN A BO. MONTONE I. SECTOR MIRAFLORES APT 824 LAS PIEDRAS, PR 00771	07/05/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	129553-1	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Frente Unido de Policías Organizados et al. v. Puerto Rico Police Department, Case No. KAC-2007-4170 ("FUPO"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim No. 161091, the master proof of claim filed on behalf of all plaintiffs associated with the litigation captioned "FUPO".						
TOTAL						Undetermined*